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June 7, 2022


Via PACER

Honorable Jesse M. Furman
United States District Court – Southern District

Application GRANTED. The conference currently scheduled for June 10, 2022, is hereby ADJOURNED to **June 16, 2022, at 4:00 p.m.** The parties shall appear in Courtroom 1105 of the Thurgood Marshall United States Courthouse, 40 Centre Street, New York, New York. Defendants shall, no later than June 13, 2022, file a status update. The Clerk of Court is directed to terminate ECF No. 60.

Re: Flores et al v. Boro Concrete Corp. et al
1:21-cv-05006-JMF
Joint Letter Motion

SO ORDERED.



June 8, 2022

Dear Judge Furman:

This office represents Defendants, Boro Concrete Corp, Martin Moore and Eric Chavez in the above referenced action.

I am writing this joint letter with Plaintiffs' counsel's consent to request that the in-person Status Conference scheduled for June 10, 2022 at 9am be adjourned for one week to June 17, 2022. I understand that we have advised the Court of a settlement "in principal," but I have had difficulty contacting my clients and my clients have had difficulty in determining how the settlement proceeds will be funded. I am scheduled to meet with my clients in the afternoon on Friday, June 10, 2022. to discuss settlement payments. I can provide an update via letter through PACER by Monday, June 13, 2022.

As such, it is respectfully requested that Your Honor grant this joint letter motion. Alternatively, counsel for Plaintiff and I are respectfully requesting that this matter be conducted virtually (video/telephonically), rather than in person. Thank you for your attention to this matter.

Very truly yours,

Timothy Kilgannon

Timothy Kilgannon, Esq.

Cc: *Via PACER* – Plaintiffs' counsel